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 14 HILTON GRAND VACATIONS CLUB, LLC

15 **UNITED STATES DISTRICT COURT**
 16 **DISTRICT OF NEVADA**

17 MELISSA PETERS,
 18 Plaintiff,
 19 v.
 20 HILTON GRAND VACATIONS CLUB, LLC; DOES I through X, inclusive; and ROE CORPORATIONS 1 through X, inclusive,
 21 Defendants.

Case No. 2:24-CV-02162-CDS-EJY

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DISCOVERY
 DEADLINES**

(FIRST REQUEST)

1 Plaintiff Melissa Peters and Defendant Hilton Grand Vacations Club, LLC hereby stipulate to
 2 extend the discovery deadlines in this case by ninety (90) days according to the schedule set forth
 3 below. This Stipulation is entered in good faith and not for the purpose of undue delay.

4 **I. STATUS OF DISCOVERY**

5 The parties held a scheduling conference under Rule 26(f) of the Federal Rules of Civil
 6 Procedure on April 2, 2025. During that conference, the parties agreed to serve initial disclosures on
 7 or before April 16, 2025, which is fourteen days from the 26(f) conference and approximately three
 8 weeks before the parties' currently scheduled Early Neutral Evaluation. The parties have not yet
 9 completed any additional discovery.

10 **II. DISCOVERY THAT REMAINS TO BE COMPLETED**

11 The parties anticipate completing written discovery in the immediate future, including requests

1 for production of document, written interrogatories, and requests for admissions. The parties will also
 2 schedule party and witness depositions as well as the deposition of Hilton's corporate representative
 3 under Rule 30(b)(6). In addition, the parties are in the process of assessing whether any expert
 4 testimony will be necessary to the claims and defenses raised in this matter. Finally, the parties
 5 anticipate certain third-party discovery efforts, including subpoenas that may result in additional
 6 witness depositions.

7 **III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY**

8 Under Local Rule 26-3, the Parties acknowledge that a stipulation to extend a deadline set forth
 9 in a discovery plan must be submitted to the Court no later than twenty-one (21) days before expiration
 10 of that deadline, and that a request made within twenty-one (21) days must be supported by a showing
 11 of good cause. This request is submitted prior to twenty-one (21) days before the next discovery
 12 deadline (Initial Expert Disclosures due May 5, 2025). Thus, LR 26-3's heightened good-cause
 13 standard does not apply to a request to extend the expert-disclosure deadline or any deadline thereafter.

14 The requested extension is necessary to allow the parties to fully explore the need for expert
 15 witnesses in this matter and to provide sufficient time to complete the written discovery and
 16 depositions necessary to develop the claims and defenses at issue in this case. At present, neither party
 17 can adequately assess whether expert witnesses are necessary without having first received the other
 18 party's initial disclosures and discovery responses. The request for ninety additional days to perform
 19 discovery will likely be sufficient to allow the parties to explore the need for experts. Moreover, an
 20 additional ninety days to complete discovery will allow the parties to attend an Early Neutral
 21 Evaluation (on May 5, 2025) and possibly narrow the issues for which discovery is needed. However,
 22 even if the Early Neutral Evaluation does not result in a settlement, the requested ninety days should
 23 provide sufficient time to complete the discovery necessary to this matter.

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1 **IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DEADLINES**

	Current Deadline	Proposed New Deadline
Amend Pleadings and Add Parties	Expired	Expired
Expert Disclosures	May 5, 2025	August 4, 2025¹
Rebuttal Expert Disclosures	June 4, 2025	September 3, 2025
Discovery Cut-Off	July 2, 2025	September 30, 2025
Dispositive Motions	August 1, 2025	October 30, 2025
Pretrial Order	September 1, 2025	December 1, 2025 (Nov. 29 is a Saturday) (If dispositive motions are filed, the deadline shall be suspended until thirty (30) days after the decision of the dispositive motions or further order of the Court.)

12 Based on the foregoing stipulation and proposed deadlines, the Parties respectfully request that
 13 the Discovery Plan and Scheduling Order deadlines be extended by ninety (90) days so the Parties
 14 may conduct remaining discovery as set forth herein.

15 Dated: April 14, 2025

16 Dated: April 14, 2025

Respectfully submitted,

Respectfully submitted,

/s/ Kristina S. Holman

Kristina S. Holman, Esq.
HOLMAN LAW OFFICE

20 Attorney for Plaintiff
MELISSA PETERS

/s/ Andrew S. Clark

Amy L. Thompson, Esq.
Andrew S. Clark, Esq.
LITTLER MENDELSON, P.C.

21 Attorneys for Defendant
HILTON GRAND VACATIONS CLUB, LLC

23 **IT IS SO ORDERED.**

24 Dated: April 14, 2025

25 
26 UNITED STATES MAGISTRATE JUDGE
27

28 4937-4444-2420 / 116024.1032

¹ Deadline fell on Sunday and was moved to the following Monday.